

LUC-308/Lin 1

6

Remarks

Entry of the above-noted amendments, reconsideration of the application, and allowance of all claims pending are respectfully requested. By this amendment, claims 1 3 and 4 are amended, claim 2 is canceled, and claims 9-14 are added. These amendments to the claims constitute a bona fide attempt by applicant to advance prosecution of the application and obtain allowance of certain claims, and are in no way meant to acquiesce to the substance of the rejections. Support for the amendments can be found throughout the specification (e.g., page 6, lines 6-12; page 8, lines 1-30), figures (e.g., FIGS. 3 and 5), and the claims. Claims 1 and 3-14 are pending.

Allowable Subject Matter:

Claims 5-8 are allowed. Applicant gratefully acknowledges this indication of allowance.

Claim Rejections - 35 U.S.C. § 103

Claims 1-4 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Cheesman in view of Easy. (U.S. Patent No. 6,618,588 B1; "Easy"). This rejection is respectfully, but most strenuously, traversed.

Applicant respectfully submits that the Office Action's citations to the applied references, with or without modification or combination, assuming, *arguendo*, that the modification or combination of the Office Action's citations to the applied references is proper, do not teach or suggest one or more elements of the claimed invention, as further discussed below.

For explanatory purposes, applicant discusses herein one or more differences between the Office Action's citations to the applied references and the claimed invention with reference to

LUC-308/Lin 1

7

one or more parts of the applied references. This discussion, however, is in no way meant to acquiesce in any characterization that one or more parts of the Office Action's citations to the applied references correspond to the claimed invention.

Applicant respectfully submits that the Office Action's citations to the applied references do not teach or suggest one or more elements of the claimed invention. A careful reading of the Office Action's citations to the applied references fails to teach or suggest, for example, converting control and voice messages at first and second locations between packet-based and non-packet-based protocols, as recited in applicant's independent claim 1.

Cheesman (column 5, lines 29-48) discloses interfaces with access tandems to convert bearer traffic from synchronous transfer mode protocol to asynchronous transfer mode protocol:

The SPMs 40 may be configured as either free-standing units or peripherals to existing access tandems. For the configuration shown in FIG. 2, the access tandems switch incoming bearer traffic from end offices and direct inter-tandem traffic to the SPMs 40. The SPMs 40 convert the traffic to STM cells and transfer the cells to the ATM network 50. The ATM network 50 in turn transfers the cells to another SPM 40 which converts the cells back to STM protocol and transfers the traffic to the appropriate access tandems. Bearer traffic in the ATM network is transferred on switched virtual circuits (SVCs) established between SPMs 40.

In order for the transit trunk subnetwork to function properly, a signal controller for receiving and interpreting common channel signaling messages associated with STM calls is required. This function is performed by a subnetwork signal controller (SSC) shown at 60 in FIG. 2. The SSC 60 interprets ISUP portions of common channel signaling messages and relays those messages between the access tandems 18, 24 and 26. The

Cheesman discloses interfacing between synchronous and asynchronous protocols. The Office Action's citation to Cheesman fails to disclose setting up a call over a packet-based transport network by directing a call intended for a mobile to a virtual tandems switch in the

LUC-308/Lin 1

8

manner set forth by applicant. Simply missing from the Office Action's citation to Cheesman is any mention of converting control and voice messages at first and second locations between packet-based and non-packet-based protocols, as recited in applicant's independent claim 1, the Office Action's citation to Cheesman fails to satisfy at least one of the limitations recited in applicant's independent claim 1.

The shortcomings of the Office Action's citation to Cheesman relative to certain elements of the claimed invention have been discussed above. The Office Action proposes a combination of the citation to Cheesman with a citation to Easy. However, the Office Action's citation to Easy does not overcome the deficiency of the Office Action's citation to Cheesman. Applicant respectfully submits that the proposed combination of the Office Action's citation to Cheesman with the Office Action's citation to Easy fails to provide the required approach, assuming, *arguendo*, that the combination of the Office Action's citation to Cheesman with the Office Action's citation to Easy is proper.

Easy (paragraph 15) discloses delivering wireless unit information to a wireline unit, referring generally to a wireline SS7 protocol and a wireless network:

Referring again to the example illustrated in FIG. 2, assume that Laura has initiated a call from her wireless unit 24 to Scott's home telephone 14 by dialing Scott's directory number (404.847.2400). Laura's call is routed in a conventional manner from her wireless unit 24 through base station 22 to the MSC 20 serving Scott's unit (arrow 1). The MSC 20 further routes the call on the basis of the dialed directory number to access tandem 18 (arrow 2), which routes the call to the SSP 12 serving Scott's calling line (arrow 3). As noted, Laura's call is routed in a conventional manner in the communications system 6 from the wireless network 8 to the wireline network 10, and so the routing includes use of the Initial Address Message (IAM) in the Integrated Services Digital Network User Part (ISUP) of the SS7 protocol. The IAM includes at least Laura's MIN and/or MDN, and may include a point code or other identifier for the MSC 20 serving Laura's wireless unit 24.

LUC-308/Lin 1

9

Easly discloses transmitting information between wireless and wireline units. The Office Action's citation to Easly fails to disclose transfer of information between packet-based and non-packet-based networks in the manner disclosed by applicant. Simply missing from the Office Action's citation to Easly is any mention of converting control and voice messages at first and second locations between packet-based and non-packet-based protocols, as recited in applicant's independent claim 1.

So, the Office Action's citation to Easly fails to satisfy at least one of the limitations recited in applicant's independent claim 1.

The Office Action's citations to Cheesman and Easly both fail to meet at least one of applicant's claimed features. For example, there is no teaching or suggestion in the Office Action's citations to Cheesman or Easly of converting control and voice messages at first and second locations between packet-based and non-packet-based protocols, as recited in applicant's independent claim 1.

For all the reasons presented above with reference to claim 1, claim 1 is believed neither anticipated nor obvious over the art of record. The corresponding dependent claims are believed allowable for the same reasons as independent claim 1, as well as for their own additional characterizations.

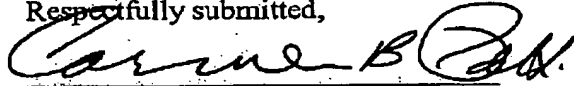
Withdrawal of the § 103 rejection is therefore respectfully requested.

LUC-308/Lin 1

10

In view of the above amendments and remarks, allowance of all claims pending is respectfully requested. If a telephone conference would be of assistance in advancing the prosecution of this application, the Examiner is invited to call applicant's attorney.

Respectfully submitted,



Carmen B. Patti
Attorney for Applicant
Reg. No. 26,784

Dated: May 2, 2005

PATTI & BRILL, LLC
Customer Number 47382